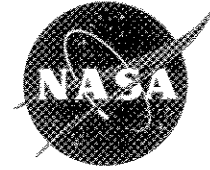


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



October 13, 2010

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Space Policy Institute Dinner in
Washington, D.C. on October 27, 2010

On October 27, 2010, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a non-profit organization under Section 501(c)(3) of the Internal Revenue Code, will hold a space policy dinner at the Primi Piatti Restaurant, in Washington, D. C. from 6:30 – 9:30 p.m.

The dinner will include Mr. Richard McKinnery, the Deputy Under Secretary of the Air Force for Space Programs, as a guest speaker. Mr. McKinnery provides oversight of military space programs, including all space-related acquisition plans, industrial base issues, and research, development, test, evaluation.

Ninety-five people have been invited to this event and approximately 48 people are expected to attend. Attendees will include personnel from NASA, other Federal Agencies, Congressional staff, White House staff, academia, industry, the media, and non-profit organizations. The estimated cost of the dinner, which includes all food and beverages, is \$65.00-\$72.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2). I further determine that there is an Agency interest in NASA personnel attending the event because it will further Agency programs or operations. Attendance at the event will allow attendees to exchange information on civilian and military space programs.

NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the reception. However, NASA employees whose duties may substantially affect GWU or the GWU Elliott School of International Affairs, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a prominent initial "A" and "G".

Adam F. Greenstone